

**IN THE CIRCUIT COURT OF WASHINGTON COUNTY, ARKANSAS  
CIVIL DIVISION**

**SIERA DELK,**

**PLAINTIFF**

**v.**

**CASE NO. \_\_\_\_\_**

**MIREYA REITH,  
ARKANSAS UNITED**

**DEFENDANTS**

**COMPLAINT**

COMES NOW Plaintiff, Siera Delk, through her counsel, Matthew Bender and Rule XV student-attorney Nicole Schaum, and for her cause of action against Defendants Mireya Reith and Arkansas United for violations of the Arkansas Civil Rights Act and tortious acts states and alleges as follows:

1. Plaintiff Siera Delk is a resident of Pulaski County, Arkansas. Siera is a 27-year-old African American woman who graduated from the University of Arkansas and is completing a masters degree at Arkansas State University. Siera is also single mother with a six-year-old daughter who began working at Arkansas United in 2020 after completing her service term in the Arkansas National Guard.
2. Defendant Mireya Reith is a resident of Washington County, Arkansas, and the Executive Director of Arkansas United, which she formed in 2010.
3. Arkansas United (AU) is a 501(c)(3) organization with its principal place of business and headquarters in Springdale, Arkansas. AU lists six staff members on the organization's website and has offices in Little Rock and Springdale.
4. The causes of this action are violations of the Arkansas Civil Rights Act by Mireya Reith, in her individual capacity and as AU Executive Director, and AU, including discrimination and retaliation against Siera, which caused tortious injuries.

## FACTUAL BACKGROUND

5. Arkansas United is a 501(c)(3) organization formed in 2010, according to their website. AU advertises itself as a service and advocacy organization with a focus on assisting immigrants with achieving citizenship and civic engagement. AU states that it works with municipal governments throughout the state of Arkansas.
6. In 2018, AU rebranded, and “went through a staff and board transition in the spring of 2018. Five staff members (two of which were part of the leadership team) transitioned out of the organization,” according to AU, and Legal Director, Casey Bryant was hired. *See* Exhibit 1 – DoD Grant Report 2018 at \*5.
7. The 2018 transition followed a list of labor grievances that were presented to the Chair of the Board of Directors in the fall of 2017. *See* Exhibit 2 – Formal List of Concerns (2017).
8. Four former AU employees presented the list of labor grievances. The former employees included members of a class protected under the Arkansas Civil Rights Act. The former employees itemized a list of concerns about labor and workplace problems, and provided examples and proposed solutions for AU and Reith to adopt. Examples of concerns included working excessive hours, “tone and mannerism when having a conversation with staff - gaslighting tactics[,] insulting and belittling staff in front of partners, other staff, community, and family.” *Id.* at \*1-2.
9. AU and Reith’s mistreatment included forcing employees to work while on medical leave including “Making H[,] work from his hospital bed while recovering from

- surgery.” *Id.* at \*2. The former employees requested that Reith “respect staff’s capacity, especially when it is medically-based.” *Id.* at \*2.
10. Reith also harassed and degraded employees with demands such as “guilting us that if a task is not met, all staff is not getting payed,” requiring students to skip class to complete work, and making emotionally manipulative comments. *Id.* at \*3.
11. Among the proposed solutions, Reith and AU were asked to “be more professional” and “respect school boundaries.” *Id.*
12. When these requests for safe and professional working conditions were not met, the former employees resigned, including Mayra Esquivel, Erick Sanchez, and Michel Rangel.
13. In 2019, AU’s organizational mission drifted to what it describes as a member-based model that provided legal services, outreach about census completion and voter registration. *See* Exhibit 3, Four Freedoms Fund Grant Programs – Spring 2019 Proposal at \*1. According to Michel Rangel, former AU Deputy Director, Reith inflated an earlier grant proposal to the Four Freedoms Grant by adding cities and engagement commitments that AU was not equipped to provide.
14. AU also began advertising new outreach programs to other community groups, including “Asian and Pacific Islanders,” and “Muslims,” and listed new partnerships with the cities of Fort Smith and Little Rock, Arkansas. *See* Exhibit 4 – Citizens for Citizenship Grant July 2019.
15. AU announced their focus on election efforts and stated their achievements included “doubling the state’s Latinx and Asian vote twice.” *Id.* at \*2.

16. That year, AU and Reith publicized they would also begin providing impact litigation services. According to AU's promotions, the "ACLU and AU have been working in partnership for the last two years to identify and address needs in rural Arkansas around issues of discrimination, unlawful detention, and accountability for hate crimes." *Id.* at \*4. AU also announced a partnership with the Bowen School of Law, and that AU had created an "approach to the private bar [that] involves cultivating our relationships with attorneys, encouraging them to become members of AU for a small donation, and as a member, participate in our legal service programs and accept referrals." *Id.* at \*1.
17. Siera started working for AU on July 11, 2020, under the supervision of its Executive Director Mireya Reith. She was paid a fixed yearly salary that included employer healthcare benefits that would begin after a sixty-day waiting period.
18. Siera had applied to work on criminal justice projects impacting the black and brown communities, but was offered and accepted a role that focused broadly on civic engagement. When Siera identified criminal justice opportunities, Reith instructed Siera to submit all criminal justice project ideas to Rosa Velázquez, AU's Lead Advocate, and discontinue working with Sonia Gutierrez, a Fayetteville City Council person, on Criminal Justice Projects. *See Exhibit 5 – August 4, 2020, Text from Reith to Siera.*
19. Siera was assigned increasingly demanding tasks with unrealistic requirements. Reith and AU required Siera to work irregular and harsh hours, which impacted her ability to perform her job, her mental health, and affected her ability to care for her daughter.

20. Siera's time at AU shared a common theme with former employees: her assignments were unclear, Reith's expectations were oppressive and erratic, and Siera faced rapid assignment changes and criticism from Reith when unreasonable demands were not met.
21. For example, on Wednesday August 18, 2020, Reith required Siera to work until 3 a.m. the next morning while Siera was visiting a friend with a medical emergency to make a public comment at a Fayetteville city council meeting.
22. During the Fayetteville public comment period, Reith was called to speak at 12:48 a.m., and again at 1:00 a.m. but was asleep. Siera was allowed to speak 1:01am. At 2:17 a.m., Reith told Siera she could sleep after the city council vote concluded. Siera worked 9:00 a.m. to past 2:15 a.m. before driving back to Little Rock where she primarily worked. *See Exhibit 6 – AU Group Text August 19, 2020.*
23. On August 19, 2020, Reith instructed Siera to complete a grant proposal for the 2020 Arkansas Public Policy Panel's Equal Voices Grant. Reith instructed Siera to use the grant budget AU submitted and was awarded from the 2020 Little Rock Census organization as a template. Siera completed the grant application for Reith on August 21, 2020. *See Exhibit 7 – Little Rock Census Grant.*
24. AU's commitment for the Little Rock Census Grant was to make more than 16,000 phone calls by phonebank staff paid \$12.50 per hour at a rate of 100 calls per hour, and more than 4,000 calls by volunteers at the same rate of 100 calls per hour **to reach 10,000 Latinx people in the Little Rock area to encourage census participation** using phone lists from "Van" and "Outvote," which are prominent phonebank databases. *Id.*

25. When Siera raised concerns to Reith that the Little Rock Census grant appeared to have be unrealistic and impossible to modify to comply with the Arkansas Public Policy Panel's Equal Voices Grant terms, Reith instructed Siera to "make it work" and told Siera to add budget line items for food and overhead expenses to reach the grant's funding cap. *See* Exhibit 8 – Equal Voices Grant Proposal.
26. In the Arkansas Public Policy Panel's Equal Voices Grant proposal, Arkansas United committed to making more than 70 calls per person an hour to **"low propensity" Asian American, Pacific Islander, Latinx, and Native American people in Northwest Arkansas.** *Id.*
27. The grant committed AU to making 23,500 phone calls within 5 weeks to a target population of over 11,700 people using phone lists from Van and Outvote, which AU could only access through a third-party organization. *Id.* The third-party nonprofit that provided the call list did not validate if the people on the call list forwarded to AU met each grant's campaign requirements.
28. Even though Siera expressed concerns that the proposal Reith wished to submit unrealistic deliverable goals and fabricated expenses, Reith disregarded Siera's concerns and directed Siera to submit AU's inflated Arkansas Public Policy Equal Voices grant proposal.
29. The Arkansas Public Policy Equal Voices grant was awarded to AU ostensibly to fund voter and census outreach. The grant award committed AU to hiring 84 phonebank staffers paid \$15 an hour to make 70 calls per hour each hour. *Id.*
30. These outreach goals were more implausible than AU revealed to funders. To complete the phonebanking, for just this grant, the proposed staff working between 9

- a.m. and 9 p.m. would have had to make 1000 calls per day, or 83 by each phonebank staff member or volunteer every hour through a twelve-hour shift. *Id.*
31. The phone calls AU promised to make for even this one grant exceeds any reasonable number for an organization of its size. *See Lessons from GOTV Experiments*, YALE INST. SOC. & POL'Y STUDIES, <https://t.ly/OZnl>; *see also Budgeting Volunteers for a Phonebank – Voter Contact*, INT'L. ASS'N. FIRE FIGHTERS (suggesting guidelines of 22 calls each hour and a total of 66 calls each day per phonebank worker), <https://is.gd/3168VL>; *see also* Peter Richardson *7 Mistakes of Political Phone Campaigns*, VAN (May 2, 2016), <https://t.ly/tn6H> (describing the need for proper training, creating a large and targeted phonebank list, providing for practice, and a staff with bilingual speakers).
32. Reith tasked Siera with fulfilling the Arkansas Public Policy Equal Voices grant deliverables, which required purchasing go-phones, recruiting contract employees and volunteers during the pandemic, and meeting the grant's outreach deliverables.
33. Reith did not provide Siera, or any other AU employee, with the funds to purchase the equipment budgeted for in the grant, nor did Reith authorize payment for phonebank staff. This inaction left Siera without resources to fulfill the grant requirements.
34. Siera learned AU made no significant effort to hire paid phonebank staff or recruit volunteers. AU neglected to use its active social media accounts to recruit volunteers or advertise for paid phonebank staffers during a time when state and national unemployment rates were at historic peaks.

35. When Siera attempted to contact people to meet the grant goals, she discovered that AU still did not have access to the Van and Outvote to reach people in the grant's target profile. Instead, AU continued to rely on a third-party organization to forward a call list. By this point, Reith had still not hired or provided Siera resources to recruit paid phonebank staff or volunteers.
36. Siera routinely found the call list was not available at a reliable time and became concerned the numbers she was provided did not match the grant's requirements, which required a unique and targeted call list.
37. During this time, AU was also committed to a campaign mission through a grant from the Four Freedom Foundation. For the Four Freedoms grant alone, AU promised to make 115,000 predictive dials, 20,000 hand dials, and send over 15,000 texts to boost voter turnout for the 2020 Election. *See Exhibit 9 - Four Freedoms 2020 Grant.* The grant award also required specific targets of eligible voters, such as 10,000 eligible black voters, to be contacted between August 1 and November 3 for the 2020 Election. *See Exhibit 10 - Four Freedoms Grant Target Groups.*
38. On August 29, 2020, Reith required Siera to work a Saturday after completing a 40 hour work week to hand out backpacks at a back to school event. During this event, Siera discovered AU was collecting parent information, including from any people in vulnerable communities, and labeling the parents as AU "members" to meet grant engagement goals without receiving informed consent.
39. The next day, August 30, 2020, Siera was told to work all day that Sunday to make phone calls. Initially, Siera thought her assignment was to make phone calls for the



- Arkansas Public Policy Equal Voices grant campaign to reach NW Arkansas community members and promote census and voter registration.
40. While phonebanking on Sunday, Reith told Siera that each call she made would be counted as a deliverable toward the Four Freedoms Foundation grant, the Arkansas Public Policy Equal Voices grant, and the Little Rock Census grant.
41. Reith's demand was impossible to deliver because of conflicting grant commitments. For example, one phone call cannot reach both the Little Rock Latinx population, which the Little Rock Census grant required, and also reach the Northwest Arkansas population of "low propensity" minority voters, which the Arkansas Public Policy Panel Equal Voices grant required.
42. The three grant campaigns that Reith instructed Siera to simultaneously phonebank for are a snapshot of working at AU. Reith dictated impossible tasks, disregarded grant campaign promises, and misused or appropriated grants funds. AU and Reith did not staff their phone banks with paid workers or volunteers, lacked reliable access to Van or Outvote to make targeted calls, and assigned all duties to a small, overworked core staff.
43. Under Reith, AU made no reasonable effort to engage the diverse audiences the three grants required and who AU promised to serve, nor was there any quality control or direction to make the nearly 150,000 calls to the specific community groups between August 1 and the November 3 Election. Reith's lack of effort was unethical and failed to serve people throughout the state as promised. Under Reith's leadership, AU breached the mission that foundations and taxpayers entrusted to it.

44. Siera's assignment on Sunday August 31 was representative of AU's work culture. She was assigned an unreasonable task to fulfill impossible grant responsibilities.
45. On Monday August 31, 2020, Siera, after working for seven days straight, including extended weekend-shifts such as working more than 12 hours on Sunday August 30, 2020, requested a day of leave for work-life balance. Reith denied Siera's leave request.
46. On September 1, 2020, Reith summoned Siera to her office for a reprimand. By this time Siera was considering if she should resign. *See* Exhibit 11 – August 31 Message.
47. In Reith's office, Reith explained that Siera could not have a day off because she was not far enough along on her assignments, which was witnessed by Saraí Portillo, AU's Deputy Director. When denied leave, Siera said AU was acting like a fraudulent organization, misusing grants, and misleading funders and the public by not accurately representing AU's voter registration and census outreach in the impacted communities AU portrayed it served.
48. Siera was immediately placed on paid administrative leave and offered a mediation opportunity, which she accepted. *See* Exhibits 12-Whats App Message Reith; Exhibit 13 – WhatsApp Message from Portillo; Exhibit 14 – WhatsApp Message from Chavez. While Siera was on administrative leave, she believed AU was conducting an internal investigation to prepare for mediation and make organizational improvements. During this time, AU did not begin providing healthcare benefits even though Siera's waiting period to receive employee sponsored healthcare for her and her daughter had passed.

49. After a month, Reith and Arkansas United changed their tone toward Siera and conditioned mediation on Siera signing of a non-disclosure agreement and non-disparagement agreement. Siera declined to sign these agreements and requested to still proceed with mediation, which AU and Reith had offered.
50. Reith and Arkansas United instead informed Siera on Friday, October 30, 2020, that she was terminated.
51. Terminating Siera was retaliatory in violation of the Arkansas Civil Rights Act and AU's organizational policies. *See* Exhibit 15 – AU Employee Handbook.
52. While AU neglected its outreach mission, Arkansas had the second lowest voter turnout of all states in the 2020 election. *See* Andrew Epperson, *Arkansas has second-lowest voter turnout percentage nationally*, KNWA (Nov. 11, 2020), <https://t.ly/bUYz> (discussing Arkansas's dismal 55.5% voter turnout rating). Although a new state turnout record, voter turnout was awful compared to national voting turnout percentages. As Professor Janine Perry remarked, “on the one hand, good for us, right? If we're just running a race against ourselves, and voter turnout is a good thing, then we did very well.” *Id.* This was in trend with Arkansas's voting turnout dropping from 40th to 51st among states during the 2018 midterm election. Similarly, the proportion of people in Arkansas who registered to vote or voted to eligible to vote falling from 2016 to 2018. *See* Greg Leding Facebook Post (December 3, 2020), <https://facebook.com/gregoryleding> (showing a widely circulated graph about Arkansas's recent voter turnout while conducting a public post-election autopsy), *but see* Antoinette Grejada, *Many Minority Voter Participate in Arkansas Election Advocates Say*, ARKANSAS SOUL (November 2020), <https://t.ly/7gfS>, (discussing

comments by Reith that Arkansas voters of color had provided “an even bigger mandate” and quoting Reith that “more people of color run for office in Arkansas is another reason minority voters showed up to the polls”).

53. Siera’s treatment by Reith and AU shows a continued pattern of organizational misconduct toward employees. *See* Exhibit 2 – Formal List of Concerns (2017); Exhibit 16 – Affidavit of Former AU Legal Director Casey Bryant (declaring her warnings to AU and Reith that their actions included harassment, intimidation, discrimination, wage and hour violations, violations of AU’s office policies and, ultimately, violations of the Arkansas Civil Rights Act).

#### **JURISDICTION AND VENUE**

54. This Court has jurisdiction of the matter and parties to this action and venue is proper in Washington County. Jurisdiction and Venue is appropriate in this court under Arkansas Code Annotated Section 16-13-201 and Arkansas Code Annotated Section 16-60-101.

55. Siera brings this action under the Arkansas Civil Rights Act for harassment and retaliation and for other wrongful acts by Reith and AU resulting in injuries.

56. Plaintiff injuries are continuing and will likely continue into the foreseeable future.

#### **COUNT 1 – DIFFERENTIAL TREATMENT BASED ON RACE AND GENDER IN VIOLATION OF THE ARKANSAS CIVIL RIGHTS ACT**

57. Siera realleges and reasserts all the allegations of fact contained in the above paragraphs, and adopts by reference all allegations of this Complaint in this and the following Counts.

58. Reith forced and intimidated and coerced Siera to work irregular hours and over weekends. This had a disparate impact on Siera as a single black woman with a six-

- year-old daughter. Working unclear hours placed an inequitable and undue burden on her as a woman and mother of her six-year-old daughter. Siera was also recruited to conduct voter registration and census outreach to the African American community in Arkansas. She was the only black staff member.
59. Reith, in violation of the Arkansas Civil Rights Act's Right to Freedom from Discrimination, A.C.A. Section 16-123-107, subjected Siera to differential treatment. Siera was forced to work excessive hours regularly. For example, Reith forced Siera to work until 3 a.m. on issues relating to protecting the civil rights of black and brown people and then told she had to report for work the following morning, despite another employee getting time off. Reith also required Siera to work weekends to fulfill deliverables rather than using the grant funds to hire paid staffers or recruit volunteers.
60. Siera was told by Reith to "make it work" on a grant application to the Arkansas Public Policy Panel and repeatedly asked to work excessive hours. Reith also directed Siera to make an impossible number of phone calls in a short time frame to meet deliverables. The effect was Siera was mistreated, important census and voter registration outreach never occurred, and vulnerable people in Arkansas were not engaged in a responsible, informed way about important rights.
61. Siera was given a template for the Arkansas Public Policy Panel grant from Reith that had unrealistic figures to achieve. That grant claimed an even more unlikely 23,000 calls before the election, or approximately 83 calls per minute between per volunteer which was unattainable and never even attempted by Reith and AU. When Siera expressed concerns that even with reworking the numbers to be more realistic, the

- Arkansas Public Policy Panel Grant was unachievable, she was silenced and Reith told to submit the grant proposal for AU anyway.
62. Other grants for similar work from the Four Freedoms Fund and Little Rock Census grant had promised another thousand calls per day. Instead of using the grant awards responsibly, Reith and AU misused funds and tasked Siera with unrealistic work responsibilities. When Siera raised concerns about the misuse of funds, the third party harms to vulnerable Arkansans, and the intimidating and hostile work environment Reith created at AU, Reith and AU suspended Siera and fired her when she refused to sign a non-disclosure agreement.
63. As a direct and proximate cause of the intentional conduct of AU and Reith's discrimination based on gender and race, Siera suffered financial injury, emotional stress, and the loss of healthcare benefits.
64. Reith and AU's conduct represented a pattern of misconduct toward their employees in violation of the Arkansas Civil Rights Act. *See, e.g.*, Exhibit 2 – Formal List of Concerns (2017).

**COUNT 2 – VIOLATION OF RIGHT TO PROTECTION FROM RETALIATION  
UNDER THE ARKANSAS CIVIL RIGHTS ACT**

65. When Siera raised her specific concerns that she and other members of protected classes under the Arkansas Civil Rights Act were being intimidated and harassed by Reith, she was placed on administrative leave and fired in retaliation. Reith, in her position as Executive Director of AU, used interference, coercion and intimidation to retaliate against Siera in violation A.C.A. 16-123-108(a)-(b).

66. Siera's effort to raise concerns about harassment was consistent with AU's workplace policies. *See* Exhibit 15 – AU Employment Handbook: Harassment at 16-17\*; Community Policy and Grievances at \*21-22.
67. Siera voiced concerns that Reith and AU were fabricating information for grant applications and reports, which funded programs and outreach to increase census participation and voting turnout. Beyond a hostile workplace, AU's misrepresentations about outreach and engagement potentially effected Arkansas's census data and congressional representation. In response to Siera's concerns about misusing grant funds, Reith and AU silenced Siera, placed her on administrative leave, and finally terminated Siera without notice on a Friday afternoon.
68. As a direct and proximate cause of the intentional conduct of AU and Reith's retaliation, Siera suffered financial injury, emotional stress, and lost health insurance.
69. Reith and AU's conduct represented a pattern of misconduct toward their employees in violation of the Arkansas Civil Rights Act. *See* Exhibit 2 – Formal List of Concerns (2017).

### **COUNT 3 – UNJUST ENRICHMENT**

70. Reith and AU forced Siera to work excessive hours and did not allow the Siera to comp her time or pay her overtime as required by AU's employment policies. *See* Exhibit 15 – AU Employee Handbook: Travel Reimbursement at \*9; Leave and Adjustment of time at \*14-15. Siera was paid a fixed salary as a "regular employee," and told that after 60 days, she would have received health care benefits for herself and her daughter, which should have started on September 11, 2020. *See* Exhibit 15 –

AU Employee Handbook: Definition of Employment Status at \*3; Health Insurance at \*12.

71. Reith and AU did not provide health insurance, as promised, after the 60-day waiting period. Instead, they failed to provide healthcare benefits and terminated Siera as an employee on October 30, 2020. Reith and AU also did not reimburse Siera for transportation costs or mileage and failed to pay Siera overtime or provide compensation time to account for Siera working excessive hours.
72. Reith and Arkansas United did not follow their organizational policy for grievances, non-retaliation, appeals process or their overtures of mediation to Siera. *See* Exhibit 15 – AU Employee Handbook: Grievances at \*21-22.
73. As a direct and proximate cause of the intentional conduct of Reith and AU, Siera's damages include the monetary deprivation suffered as a result of unjust enrichment and wage theft.
74. Reith and AU's conduct represented a pattern of harassment, retaliation, and labor misconduct toward their employees. *See* Exhibit 2 – Formal List of Concerns (2017); *see also* Exhibit 16: Affidavit of Former Legal Director Casey Bryant.

#### **COUNT 4 – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

75. Reith intentionally mistreated and bullied Siera while she was employed at AU. This occurred via text messages, emails, telephone calls and in-person conversations.
76. Reith offered mediation as a way to resolve concerns, and encouraged Siera to use mediation as a chance to express to Reith how AU could improve its compliance with the organization's mission and fiduciary obligations to funders and grant requirements. Siera expressed interest in a mediation process, but Reith and AU



conditioned the mediation offer on Siera signing a non-disclosure agreement then fired Siera.

77. As a direct and proximate cause of the AU and Reith's intentional conduct, Siera suffered mental pain and suffering, income loss, emotional stress, and the loss of healthcare benefits, for both her and her daughter, during the global pandemic and economic recession.

#### **COUNT 5 – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

78. Siera reincorporates and reallages the facts and allegations in the above paragraphs to the extent AU and Reith's conduct was negligent.

79. As result of AU and Reith's negligent conduct, Siera suffered mental pain and suffering, income loss, emotional stress, and the loss of healthcare benefits, for both her and her daughter, during the global pandemic and economic recession.

#### **REQUEST FOR DAMAGES & PUNITIVE DAMAGES**

80. Siera requests the maximum damages provided for under Arkansas Code Annotated 16-123-107 (2)(B)(ii) of \$50,000, or in the alternative \$15,000 under Arkansas Code Annotated 16-123-107 (2)(B)(i) if AU has fewer than 15 employees.

81. As a result of the Reith and AU's wrongful conduct, Siera has suffered a loss of income, healthcare benefits, and emotional distress, and requests \$25,000 in damages.

82. Siera reserves the right to amend her Complaint.

83. Because Reith and AU's conduct was intentional and represented a pattern of conduct, Siera should be awarded punitive damages to prevent future similar conduct.

84. Siera requests \$50,000 in punitive damages, which represents \$10,000 for each employee in a protected class that is known Reith and AU harassed and injured.

## DEMAND FOR JURY TRIAL

85. Pursuant to Article 2, Section 7 of the Arkansas Constitution and Arkansas Civil

Procedure Rule 38, Siera requests that all issues be determined by a jury of her peers.


WHEREFORE, Plaintiff Siera Delk prays for judgment against the Defendants Mireya Reith and Arkansas United, for any attorney fees and litigation costs pursuant to A.C.A. Section 16-123-105(b), and for all other available relief.

Respectfully Submitted,  
Siera Delk



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Siera Delk  
Plaintiff



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